



Samuel J. Rubin
+1 212 813 8850
SRubin@goodwinlaw.com

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018

goodwinlaw.com
+1 617 570 1000

January 30, 2024

By ECF

The Honorable Ann Donnelly
United States District Judge
United States District Court for the Eastern District of New York
United States Courthouse, Courtroom 4G
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Hamed v. Citibank N.A., Case No. 1:24-cv-00226-AMD-JRC

Dear Judge Donnelly:

We represent Defendant Citibank, N.A. (“Citibank” or “Defendant”) in the above-referenced action and write in accordance with the Court’s Individual Practice to request an extension of Citibank’s time to answer, move against, or otherwise respond to the Complaint from February 1, 2024 until March 4, 2024.

The undersigned counsel have recently been retained and the extension is necessary to allow sufficient time to investigate and respond to the allegations set forth in the Complaint. Citibank has made no previous requests for an extension to respond to the Complaint and the requested extension will not impact any other scheduled deadlines in the action. The undersigned counsel has conferred with Plaintiff’s counsel who consents to this requested extension.

Citibank respectfully requests that the Court extend the deadline for Citibank to answer, move against, or otherwise respond to the Complaint from February 1, 2024 to Monday, March 4, 2024.

Respectfully submitted,

/s/ Samuel J. Rubin

Samuel J. Rubin

cc: Amir Toossi, (via ECF and email)